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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,
Plaintiff,

25 CV 4423

v.

UNITED STATES DEPARTMENT OF VETERANS AFFAIRS,
DR. CORINNE GALGAY, in her official and personal capacities,
DOUG COLLINS, in his official and personal capacities,
Defendants.

Civil Action No. _____

MOTION TO PROCEED UNDER PSEUDONYM AND TO SEAL SENSITIVE IDENTIFYING MATERIALS

Plaintiff, proceeding pro se, respectfully moves this Court for leave to proceed under a pseudonym pursuant to federal common law and this Court's inherent equitable powers, and to seal sensitive personal identifiers and exhibits attached to her Emergency Civil Rights Complaint and supporting Memorandum of Law. In support of this motion, Plaintiff states as follows:

I. LEGAL STANDARD

Federal courts permit plaintiffs to proceed anonymously in exceptional cases where disclosure would expose the party to harm, harassment, retaliation, or further trauma. See *Sealed Plaintiff v. Sealed Defendant #1*, 537 F.3d 185, 189 (2d Cir. 2008); *Doe v. Frank*, 951 F.2d 320, 323 (11th Cir. 1992). The Second Circuit has identified a non-exhaustive balancing test that weighs the plaintiff's need for anonymity against the public interest and prejudice to the defendant.

Courts routinely allow pseudonym protections in cases involving military sexual trauma, psychiatric abuse, retaliation, and other stigmatizing harms. See *Doe v. City of New York*, 201 F.R.D. 100, 103 (S.D.N.Y. 2001) (granting anonymity for plaintiff in psychiatric disability case); *Doe v. USCIS*, 2020 WL 3268663 (S.D.N.Y. 2020).

II. GROUNDS FOR PROCEEDING UNDER PSEUDONYM

Plaintiff is a United States Army combat veteran and survivor of multiple rapes during military service. Her federal civil rights complaint includes detailed accounts of sexual trauma, suicidal crises, psychiatric manipulation, and systemic retaliation by the Department of Veterans Affairs.

She is currently displaced with five minor children, caring for a disabled veteran spouse, and navigating ongoing threats to her mental health and family stability. Public disclosure of her name in this context would:

- Expose her and her children to stigma, institutional backlash, and further retaliation;
- Deter her from accessing emergency relief for fear of harassment or public re-identification;
- Violate the spirit of confidentiality protected under 38 U.S.C. § 7332 and HIPAA, which shield mental health and trauma disclosures.

Plaintiff has no improper purpose in proceeding under pseudonym. She will file her real name and full identity under seal with the Court, in compliance with all procedural requirements.

III. REQUEST TO SEAL LIMITED EXHIBITS

Plaintiff also respectfully requests leave to redact and/or seal exhibits that contain:

- Protected health information;
- Suicide prevention notes;
- Mental health records involving medication and psychiatric evaluations;
- Names or identifying information of minor children or third parties.

These redactions are narrowly tailored to protect privacy and ensure the safety of non-parties. Plaintiff will file a redacted public version and an unredacted version under seal as appropriate.

IV. NO PREJUDICE TO DEFENDANTS

Proceeding under pseudonym causes no prejudice to Defendants, all of whom are aware of Plaintiff's identity and have been previously notified through administrative complaints, prior litigation, or government correspondence. Defendants retain full ability to respond, investigate, and litigate.

V. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that this Court:

1. Grant her leave to proceed under the pseudonym JANE DOE in all public filings;
2. Permit her to file her full name and personal identifiers under seal;
3. Authorize redaction or sealing of exhibits containing private, medical, or identifying information;
4. Grant such further relief as this Court deems just and proper.

Respectfully submitted,

JANE DOE

Plaintiff, pro se

[Mailing Address Under Seal]

[Email Under Seal]

[Phone Number Under Seal]

27 more may 2025

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Plaintiff,

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DOUG COLLINS, in his official and personal capacities,

Defendants.

Civil Action No. _____

MOTION TO FILE PERSONALLY IDENTIFYING INFORMATION UNDER SEAL

Pursuant to the Court's inherent authority and Local Rule 79.3, Plaintiff respectfully moves for leave to file her personally identifying information under seal. This information will be submitted under separate cover and clearly labeled "FILED UNDER SEAL."

Plaintiff is proceeding under the pseudonym JANE DOE in this civil rights action involving military sexual trauma, psychiatric retaliation, and systemic exclusion from care. In compliance with Rule 11 of the Federal Rules of Civil Procedure, Plaintiff is submitting her full identifying information to the Court under seal, including:

- Full Legal Name: Kerby Stracco
- Residential Address: 1460 N Highview Ln, Alexandria, VA 22311
- Telephone Number: (650) 208-1526
- Email Address: kerby.stracco@gmail.com

This sealed submission is necessary to protect Plaintiff's safety and privacy due to the sensitive nature of this case, which involves allegations of rape, suicide prevention intervention, child endangerment, and federal retaliation. Public disclosure of her identifying information would place Plaintiff and her minor children at serious risk of further harm.

This identifying information is being filed under separate cover, clearly marked "FILED UNDER SEAL." No prejudice will result to Defendants, who are already aware of Plaintiff's identity through previous administrative proceedings and litigation.

WHEREFORE, Plaintiff respectfully requests that the Court:

1. Grant leave to file her personally identifying information under seal;
2. Direct the Clerk to maintain the sealed identity submission separate from the public docket;
3. Grant such further relief as this Court deems just and proper.

Respectfully submitted,

JANE DOE (Real Name: Kerby Stracco)

Plaintiff, pro se

FILED UNDER SEAL:

Kerby Stracco

1460 N Highview Ln

Alexandria, VA 22311

(650) 208-1526

kerby.stracco@gmail.com